

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

DANIEL PANIGHETTI, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

INTELLIGENT BUSINESS SOLUTIONS,
INC.

Defendant

Civil Action No. 1:23-cv-209

MOTION TO DISMISS PLAINTIFF'S CLASS ACTION COMPLAINT

Defendant Intelligent Business Solutions, Inc., by and through its undersigned counsel, hereby moves pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) to dismiss the Class Action Complaint. In support thereof, Defendant relies upon the accompanying Memorandum of Law, which is incorporated herein by reference.

Dated: April 6, 2023

YOUNG MOORE AND HENDERSON, P.A.

/s/ Brian O. Beverly

Brian O. Beverly

State Bar No. 21925

P.O. Box 31627

Raleigh, NC 27622

(919) 861-5514

brian.beverly@youngmoorelaw.com

Attorneys for Defendant

Intelligent Business Solutions, Inc.

CERTIFICATE OF SERVICE

I, Brian O. Beverly, state that I filed a true and correct copy of the Motion of Defendant Intelligent Business Solutions, Inc., to Dismiss Plaintiff's Class Action Complaint via the Court's electronic filing system, which caused a copy to be served on all counsel of record.

YOUNG MOORE AND HENDERSON, P.A.

BY: /s/ Brian O. Beverly
Brian O. Beverly

*Attorneys for Defendant
Intelligent Business Solutions, Inc.*

Dated: April 6, 2023